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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/27/2024

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November 26, 2024

VIA ECF

Hon. Analisa Torres
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15D
New York, NY 10007

**Re: Luis Manjarres, et al. v. Solar Mosaic LLC, et al., Case No. 1:24-cv-07714-AT
Request to Manually Lodge Audio File Under Seal**

Your Honor:

Troutman Pepper Hamilton Sanders LLP represents Solar Mosaic LLC (“Solar Mosaic”) in the above matter. We write pursuant to Local Civil Rule 7.1(d) and Rule 5(d)(2)(A) of the Federal Rules of Civil Procedure. Specifically, Solar Mosaic requests leave to manually lodge one audio file as Exhibit 5 to Exhibit A to its Motion to Compel Arbitration (Dkt. 27) (“Motion”). The audio recording is being submitted via mail to chambers. Solar Mosaic respectfully requests that the audio recording be made part of the record under seal.

As discussed in Solar Mosaic’s Motion, Exhibit 5 to Exhibit A is an audio file containing a recorded telephone conversation between Plaintiff and Solar Mosaic on the day the loan contract containing the arbitration provision was signed. The recording is pertinent to the Motion.

Pursuant to Section 6.15 of the Electronic Case Filing Rules & Instructions, a party may seek leave of court to allow the non-electronic filing of exhibits when they are unable to comply with electronic filing under seal through the ECF system (e.g., audio files). The audio file at Exhibit 5 to Exhibit A cannot be converted to a form accepted by the ECF system.

Solar Mosaic further requests leave to lodge the audio file under seal. The recording contains personally identifiable information of Plaintiff Luis Manjarres. In particular, the recording contains Plaintiff’s social security number and date of birth. The personal information is subject to the redaction requirements of the E-Government Act of 2002, as prescribed in the Notice Regarding Privacy and Public Access to Electronic Civil and Criminal Case Files.

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In light of the foregoing, Solar Mosaic respectfully requests the Court grant it leave to manually lodge Exhibit 5 to Exhibit A and for it to be lodged under seal so that the audio file can be made part of the record while protecting Plaintiff's personally identifiable information.

Thank you for considering this request.

Respectfully submitted,

TROUTMAN PEPPER HAMILTON SANDERS
LLP

By: Kalama M. Lui-Kwan
Kalama M. Lui-Kwan

GRANTED. By **December 3, 2024**, Solar Mosaic LLC shall email a copy of the audio file to Torres_NYSDChambers@nysd.uscourts.gov. Counsel for the other parties shall be included on the email.

SO ORDERED.

Dated: November 27, 2024
New York, New York

A handwritten signature in black ink, appearing to be "A. Torres", written over a horizontal line.

ANALISA TORRES
United States District Judge